

Exhibit 1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ELLIOTT BROIDY, et al.,

Plaintiffs,

—v.—

GLOBAL RISK ADVISORS LLC, et al.,

Defendants.

Case No. 1:19CV11861 (MKV)

DECLARATION OF GEORGE J. TERWILLIGER III

I, George J. Terwilliger III, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over the age of 18 and competent to testify in this matter.
2. I have personal knowledge about the matters stated in this Declaration.
3. I am an attorney with the law firm of McGuireWoods LLP, and we represent Plaintiffs Elliott Broidy and Broidy Capital Management, LLC in the above-captioned matter.
4. Since the substitution of McGuireWoods for prior counsel, we have undertaken substantial investigative efforts to identify what the Court described as a “link” between the hacking of Plaintiffs’ computers and Defendants Global Risk Advisors LLC (“GRA”) and Kevin Chalker (“Chalker”). *See* ECF No. 89.
5. Through our investigation, we obtained information from a witness with personal knowledge, a former GRA employee and Chalker associate (the “Whistleblower”), that establishes the factual link required by the Court.
6. Our firm interviewed the Whistleblower in May 2021. During that interview, we inquired into the Whistleblower’s background, his employment with GRA, and the nature of his

work. We also inquired about his reasons for leaving GRA and his reasons for wishing to remain anonymous.

7. Based on his interview, I am satisfied that the Whistleblower has a credible basis of knowledge for his statements in his declaration. Moreover, he provides a credible basis for his fear for the safety of himself and his family. The Whistleblower's fear for his safety is supported by other information he has supplied to us, which I am willing to discuss with the Court *ex parte*.

8. Our firm has retained the original, signed copy of the Whistleblower's declaration.

9. In light of the Whistleblower's fear for the safety of himself and his family, we promised to file a copy of his declaration with a pseudonym. We further advised him that we would seek leave to submit a copy of the original, signed version of his declaration to the Court for *in camera* review.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 1st day of June, 2021.



George J. Terwilliger III